

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

**FILED**

SEP 13 2022

MICHAEL A. CAMPBELL,

(Enter the full name of the plaintiff.)

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY ku DEPUTY

v.

Case No. CIV-22-399-R  
(Court Clerk will insert case number)

(1) OKLAHOMA COUNTY DET.

(2) CENTER, et al

(3) \_\_\_\_\_

(Enter the full name of each defendant. Attach additional sheets as necessary.)

THE FIRST AMENDED  
PRO SE PRISONER CIVIL RIGHTS COMPLAINT

Initial Instructions

1. You must type or legibly handwrite the Complaint, and you must answer all questions concisely and in the proper space. Where more space is needed to answer any question, you may attach a separate sheet.
2. You must provide a full name for each defendant and describe where that defendant resides or can be located.
3. You must send the original complaint and one copy to the Clerk of the District Court.
4. You must pay an initial fee of \$402 (including a \$350 filing fee and a \$52 administrative fee). The complaint will not be considered filed until the Clerk receives the \$402 fee or you are granted permission to proceed *in forma pauperis*.
5. If you cannot prepay the \$402 fee, you may request permission to proceed *in forma pauperis* in accordance with the procedures set forth in the Court's form application to proceed *in forma pauperis*. See 28 U.S.C. § 1915; Local Civil Rule 3.3.

- If the court grants your request, the \$52 administrative fee will not be assessed and your total filing fee will be \$350.
- You will be required to make an initial partial payment, which the court will calculate, and then prison officials will deduct the remaining balance from your prison accounts over time.
- These deductions will be made until the entire \$350 filing fee is paid, **regardless of how the court decides your case.**

7. The Court will review your complaint before deciding whether to authorize service of process on the defendants. *See* 28 U.S.C. §§ 1915(e)(2), 1915A; 42 U.S.C. § 1997e(c)(1). If the Court grants such permission, the Clerk will send you the necessary instructions and forms.

8. If you have been granted permission to proceed *in forma pauperis*, the United States Marshals Service will be authorized to serve the defendants based on information you provide. If you have not been granted permission to proceed *in forma pauperis*, you will be responsible for service of a separate summons and copy of the complaint on each defendant in accordance with Rule 4 of the Federal Rules of Civil Procedure.

### **COMPLAINT**

#### **I. Jurisdiction is asserted pursuant to:**

✓ 42 U.S.C. § 1983 and 28 U.S.C. § 1343(a)(3) (NOTE: these provisions generally apply to state prisoners), or

       *Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics*, 403 U.S. 388 (1971), and 28 U.S.C. § 1331 (NOTE: these provisions generally apply to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

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**II. State whether you are a:**

- ☐ Convicted and sentenced state prisoner  
☐ Convicted and sentenced federal prisoner  
☒ Pretrial detainee  
☐ Immigration detainee  
☒ Civilly committed detainee  
☐ Other (please explain) \_\_\_\_\_

**III. Previous Federal Civil Actions or Appeals**

List each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility.

1. Prior Civil Action/Appeal No. 1

a. Parties to previous lawsuit:

Plaintiff(s): MICHAEL A. CAMPBELL

Defendant(s): JODY JONES, ETC....

b. Court and docket number: 684 FED. APPX. 750

c. Approximate date of filing: 2013

d. Issues raised: DELIBERATE INDIFFERENCE

e. Disposition (for example: Did you win? Was the case dismissed? Was summary judgment entered against you? Is the case still pending? Did you appeal?): \_\_\_\_\_

CASE DISMISSED

f. Approximate date of disposition: 2016

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on a separate sheet(s).

#### IV. Parties to Current Lawsuit

State information about yourself and each person or company listed as a defendant in the caption (the heading) of this complaint.

1. Plaintiff

Name and any aliases: MICHAEL A. CAMPBELL

Address: 2550 W. FRANKLIN<sup>Rd</sup>, NORMAN OKLA. 73069

Inmate No.: 2019001911

2. Defendant No. 1

Name and official position: WILLIAM MONDAY,

ADMINISTRATOR

Place of employment and/or residence: [REDACTED]

[REDACTED] OKLA. CO. DET. CENTER

How is this person sued? (☒ official capacity, (☒ individual capacity, (☒ both

3. Defendant No. 2

Name and official position: GREG WILLIAMS

ADMINISTRATOR

Place of employment and/or residence: OKLA. CO. DET. CENTER

How is this person sued? (☒ official capacity, (☒ individual capacity, (☒ both

If there are more than two defendants, describe the additional defendants using this same format on a separate sheet(s).



4. DEFENDANT No. 3

NAME AND OFFICIAL POSITION: DR. WINCHESTER, DOCTOR

PLACE OF EMPLOYMENT: OKLA. CO. DET. CENTER, 201 N. SHARTEL

HOW IS THIS PERSON SUED? BOTH ☒ CAPACITIES

5. DEFENDANT No. 4

NAME AND OFFICIAL POSITION: AMANDA, LNU

PLACE OF EMPLOYMENT: OKLA. CO. DET. CENTER, 201 N. SHARTEL

HOW THIS PERSON IS SUED? BOTH ☒ CAPACITIES

6. DEFENDANT No. 5

NAME AND OFFICIAL POSITION: OTHELLA, LNU

PLACE OF EMPLOYMENT: OKLA. CO. DET. CENTER, 201 N. SHARTEL, OKC. OK.

HOW THIS PERSON IS SUED? BOTH ☒ CAPACITIES

7. DEFENDANT No. 6

NAME AND OFFICIAL POSITION: OKLA. CO. CR. JUSTICE AUTHORITY

PLACE OF EMPLOYMENT: 201 N. SHARTEL, OKLA. CITY, OKLA. 73102

HOW THIS PERSON IS SUED? BOTH ☒ CAPACITIES

8. DEFENDANT No. 7

NAME AND OFFICIAL POSITION: TURNKEY HEALTH, SUED IN BOTH ☒ CAPACITIES

PLACE OF EMPLOYMENT: 201 N. SHARTEL, OKLA. CITY, OKLA. 73102

6. Do not include claims relating to your criminal conviction or to prison disciplinary proceedings that resulted in loss of good time credits.

- If a ruling in your favor "would necessarily imply the invalidity" of a criminal conviction or prison disciplinary punishment affecting the time served, then you cannot make these claims in a civil rights complaint unless you have already had the conviction or prison disciplinary proceeding invalidated, for example through a habeas proceeding.

### Claims

List the federal right(s) that you believe have been violated, and describe what happened. Each alleged violation of a federal right should be listed separately as its own claim.

#### 1. Claim 1:

(1) List the right that you believe was violated:

THE RIGHT TO BE FREE FROM DELIBERATE INDIFFERENCE TO MY SERIOUS MEDICAL NEEDS & MY DAILY SUFFERING EXCRUCIATING PAIN, IN VIOLATION OF OKLA. CONST., ART. 2 §§§ 7, 8 & 9; U.S. CONST. 8<sup>TH</sup>, 14<sup>TH</sup> AMENDS; AS WELL AS THE INHUMANE CONDITIONS OF CONFINEMENT....

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

Ⓐ DEFENDANTS WILLIAM MONDAY & GREG WILLIAMS; THE OKLA. CRIM. JUSTICE AUTHORITY; TURNKEY HEALTH & DR. WINCHESTER EACH HAD KNOWLEDGE<sup>THAT</sup> PRIOR TO BEING ARRESTED 02-15-2022, I WAS UNDER DR. ALI'S CARE AT THE V.A. HOSPITAL IN OKC, OKLA. → SEE P. 7



AND THAT I HAD BEEN SEEN DURING PRE-OP BY THE ORTHOPEDIC SURGEON WHOM WAS SCHEDULED TO PERFORM MY MUCH NEEDED SURGERY: "TOTAL HIP JOINT REPLACEMENT SURGERY."

EACH OF THESE DEFENDANTS HAS DELIBERATELY TREATED ME INDIFFERENT TO OTHER PATIENTS SUFFERING EXCRUCIATING PAIN DAILY, AS A RESULT FOR THEIR NEED OF A TOTAL HIP JOINT REPLACEMENT SURGERY. EACH OF THESE DEFENDANTS HAS IGNORED, BELITTLED, AND HAS NOT TAKEN MY SUFFERING EXCRUCIATING PAIN SERIOUSLY; NOR HAVE THEY TAKEN MY IMMEDIATE NEED FOR SURGERY SERIOUSLY.

FURTHERMORE, EACH OF THE ABOVE MENTIONED DEFENDANTS CONTINUE TO IGNORE THE MEDICAL FACT THAT "MY HIP JOINT BONE STRUCTURE IS PROGRESSIVELY DETERIORATING WITH A DEBILITATING AFFECT THAT DECREASED & CONTINUE TO DECREASE MY MOBILITY AND MY RANGE OF MOTION, SQUATTING - SITTING - STANDING - WALKING AND LAYING DOWN.

(D) (B)

DR. WINCHESTER REFUSED TO PROVIDE ME WITH ANYTHING FOR MY PAIN EXCEPT COMMON ASPIRINS, OR THAT WHICH WAS THE EQUIVALENT THEREOF. THIS IS A DELIBERATE PERSONAL DECISION. HE DETERMINED THAT I HAVE A "SEVERE DEGENERATIVE DISEASE IN MY LEFT HIP JOINT, THEREFORE HE'S AWARE OF THE INCREASING INTENSITY OF MY PAIN AS MY BONES DEGENERATE, YET TO THIS VERY MOMENT I SUFFER. I WAS UNDER THE CARE OF DR. WINCHESTER FROM 02-15-2022 TO 05-27-2022, AND ALL HE DID WAS TO CONFIRM MY PAIN AND "HE TOLD ME THAT HE WAS NOT ALLOWED TO GIVE ME THE TYPE OF PAIN MANAGEMENT THAT HE REALIZE THAT I NEED" HE SAID "ALL HE WAS ALLOWED TO PRESCRIBE FOR MY PAIN WAS SOMETHING NOT MORE POTENT THAN A COMMON ASPIRIN." WHICH WAS NOT TRUE, BECAUSE 05-27-2022, I WAS MEDICALLY O.R. OUT OF STATE CUSTODY AND INTO THE CUSTODY OF THE U.S. MARSHALL AND NOT LONG AFTER MY ARRIVAL TO THE CLEVELAND Co. DET. CENTER, DR. PATA (BECKY) PRESCRIBED ME COBINE/TYLENOL #4.



DR. PATA + DR. WINCHESTER ARE EMPLOYED BY TURNKEY HEALTH. AFTER TWO WEEKS, DR. BECKY PATA DISCONTINUED THE CODINE/TYLENOL #4 AND PLACED ME ON THE SAME MEDICATION DR. WINCHESTER DESCRIBED AS "NOT MUCH MORE POTENT THAN AN ASPIRIN." DR. BECKY PATA STATES THAT: "EMPLOYER WILL NOT ALLOW HER TO PRESCRIBE THE DEFINITELY NEEDED PAIN MANAGEMENT MEDICATION I SO DESPERATELY NEED," SHE REALIZE + ACKNOWLEDGE MY NEED, YET SHE IS FORCED TO VIOLATE HER HIPPOCRATIC OATH AS A HEALTH PROFESSIONAL BECAUSE OF THE POLICIES + CUSTOMARY PRACTICES OF TURNKEY HEALTH.

(2)(G)

TURNKEY HEALTH: HAS AND CONTINUE TO THIS VERY MOMENT TO DELIBERATELY TREAT ME INDIFFERENT TO OTHER PATIENTS WHOM HAVE A SEVERE DEGENERATIVE DISEASE, IN NEED OF TOTAL HIP JOINT REPLACEMENT. THEIR POLICIES, THEIR POLICY MAKERS AND THOSE RESPONSIBLE [DR. WINCHESTER, DR. PATA, AMANDA LUU, OTHELO LUU] FOR THE ENFORCEMENT + AND ABIDING-BY TURNKEY HEALTH'S POLICIES AND WIDESPREAD CUSTOMARY PRACTICES ARE "NEGLIGENT OF THEIR HIPPOCRATIC OATH TURNKEY HEALTH HAS TAKEN [AS WELL AS THEIR PHYSICIANS] TO OBSERVE MEDICAL ETHICS DERIVING FROM THE SCHOOL OF MEDICINE FROM WHICH THE "HIPPOCRATIC OATH + NAME" ORIGINATED FROM.

THE POLICY MAKERS OF TURNKEY HEALTH, THEIR POLICIES + EMPLOYEES ARE VIOLATING AT THIS VERY MOMENT, THEIR SOLEMN PROMISE OF PROVIDING QUALITY HEALTH CARE TO MY SERIOUS MEDICAL RIGHT NOW, AS I'M CRYING OUT FOR HELP PLEASE? YET, DR. PATA STATES THAT HER BOSS WILL NOT ALLOW HER TO AIDE + ASSIST MY PAIN MANAGEMENT NOR WILL THEY PROVIDE FOR THE EXACT, AND ONLY REMEDY THAT DR. WINCHESTER STATED FOR MY CONDITION IS "A TOTAL HIP JOINT REPLACEMENT." TURNKEY HEALTH ADMINISTRATORS, THEIR POLICY MAKERS,



THEIR POLICIES; RECOGNIZE, REALIZE, ACKNOWLEDGE MY DISEASE AND THE CURE THEREOF.... YET THEY DELIBERATELY TREAT ME INDIFFERENT FROM OTHER PEOPLE WITH "SEVERE DEGENERATIVE DISEASE REQUIRING HIP JOINT REPLACEMENT SURGERY. TURNKEY HEALTH'S NEGLIGENCE AND TOTAL DISREGARD OF THE HIPPOCRATIC OATH THEY'VE BREACH HAS RESULTED IN THE REDUCTION OF MY RANGE OF MOTION AND MY ABILITY TO SIT, STAND, SQUAT, BEND AND EVEN MY ABILITY TO RELAX COMFORTABLY WHEN I LAY DOWN OR RECLINE TO ANY DEGREE. TURNKEY HEALTH'S POLICIES AND POLICY MAKER'S "NEGLIGENCE" IS TAKING A CRIPPLING EFFECT ON MY HIP + LEG WHICH IS INCREASING MY ALREADY FORM OF DISABILITY TO THE LEVEL OF BEING A TOTAL CRIPPLE:

(2)(D)

AMANDA LNU: ON APRIL 1, 2022, I WAS BEDRIDDEN WITH SO MUCH PAIN THAT I COULD NOT RAISE MYSELF UP OFF THE BED. THE NURSE WHO PASSED OUT MEDICATION THAT MORNING SAID THAT SHE COULD NOT [BY POLICY] GIVE ME MY MEDS BECAUSE POLICY WOULD NOT ALLOW HER TO TAKE THE 2 OR 3 STEPS IT TOOK TO GIVE ME MY PAIN MEDS AS LONG AS I REMAINED IN BED. THE OFFICER WHO ESCORTED THE NURSE OBSERVED MY CONDITION AS THEY BOTH STOOD IN THE DOORWAY, AND SHE SAID TO THE NURSE: "GIVE ME HIS MEDICATION, I WILL GIVE IT TO HIM," AND SHE DID. THEY BOTH STOOD IN THE DOORWAY AS THEY RADIOED FOR MEDICAL HELP. SOON THEREAFTER AMANDA, LNU ARRIVED, TOOK MY BLOOD PRESSURE AND RAN A INK PEN UP & DOWN MY LEG AND SAID THAT "I NEEDED A DOCTOR, AND SHE WILL BE RIGHT BACK WITH THE DOCTOR." SHE JUST LEFT ME LAYING THERE. NEITHER HER NOR A DOCTOR EVER RETURNED, I WAS FORCED TO ENDURE SUCH TREATMENT FOR MY SERIOUS MEDICAL NEED.

(2)(E)

OTHELLA LNU: ON APRIL 26, 2022, I FILED A EMERGENCY GRIEVANCE # 175683172, BECAUSE OTHELLA LNU DELIVERS THE EVENING PAIN MEDICATION



WHICH IS SCHEDULED DAILY AFTER THE LAST MEAL AROUND 5:00p.m.. OTHELLA LNU AND THE OTHER EVENING NURSES, THEIR CUSTOMARY PRACTICE THROUGHOUT THE FACILITY IS TO PASS OUT THE 5:00p.m. PAIN MEDS. AT 12:00a.m.. ON 04/26/2022, MY PAIN WAS SO SEVERE THAT I COULD NOT LIFT MYSELF OUT OF THE BED AS OTHELLA LNU STOOD IN THE DOORWAY WITH MY MEDICATION IN HIS HANDS AND TOLD ME TO GET UP OR NO MEDS. OTHELLA & THE ESCORTING OFFICER LAUGHED AND JOKED AS I LAID THERE IN SEVERE PAIN. THE ESCORTING OFFICER SAID TO OTHELLA: "IF YOU AIN'T GOING TO GIVE IT TO HIM I SURE AIN'T!" THEY BOTH JUST WALKED OFF AND LEFT ME LAYING THERE IN PAIN.

(2)(F)

MR. WILLIAM MONDAY AND MR. GREG WILLIAMS, ADMINISTRATORS OF OKLA. CO. DET. CENTER/CRIMINAL JUSTICE AUTHORITY'S POLICIES: IS RESPONSIBLE THROUGH THEIR OFFICIAL POLICIES, AND INFORMAL CUSTOMS AMOUNTING TO A WIDESPREAD PRACTICE OF "NEGLECT" AND "DELIBERATE INDIFFERENCE" TO MY SERIOUS MEDICAL NEED THROUGH THEIR CUSTOMS OF NOT PROVIDING HEALTH CARE TO PRE-TRIAL DETAINEE, BED STRICKEN WITH PAIN AND "POLICY" WILL NOT ALLOW THE PILL CALL LNU'S TO STEP INSIDE A CELL (2 FT.) TO PASS A BEDSTRICKEN W/PAIN INMATE HIS PAIN MEDICATION. THE PILL CALL/MED PASS NURSE IN THE SITUATION, LEAVE IT TO THE DISCRETION OF THE SECURITY OFFICER TO HAND THE INMATE HIS MEDICATION OR NOT. MANY OFFICERS REFUSE TO PASS THE MEDICATION, BECAUSE THEY SAY THAT IS NOT THEIR JOB TO PASS MEDS. THEREFORE, THE INMATE IS FORCED TO LAY IN HIS CELL IN PAIN, WHILE THE MED PASS NURSE, STANDING 2 FT. AWAY REFUSE TO GIVE THE INMATE HIS/HER MEDICATION THAT SHE IS HOLDING IN THEIR HAND. HE OR SHE WOULD JUST WALK ON OFF WITH MEDS. IN HAND, AND LEAVE (ME) THE INMATES LAYING THERE IN PAIN.... THE POLICIES AND POLICY MAKERS ARE GUILTY OF NEGLIGENCE & DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS AS A RESULT OF THEIR STAFF



MEMBERS AND THEIR EMERGENCY MEDICAL TELEPHONE/WALL SPEAKER OPERATORS ARE <sup>NOT</sup> PROPERLY NOR ADEQUATELY TRAINED TO RESPECT NOR RESPOND TO "THE SERIOUS MEDICAL NEEDS OF INMATES" AND THIS FACT IS ONE OF THE MAJOR CAUSE OF SO MANY DEATHS IN THE OKLA. CO. DET. CENTER. THEIR POLICY + POLICY MAKERS ALLOW ANYONE, UNTRAINED PERSON OFF THE STREETS, TO BE HIRED TODAY AND BE OPERATING THE EMERGENCY PHONE SYSTEM TOMORROW OR THE FOLLOWING WEEK, WITH NO TRAINING. EVEN THEIR LONG TIME EMPLOYEES ARE NOT TRAINED PROFESSIONALLY TO RESPECT NOR RESPOND TO A CALL, EXPRESSING A SERIOUS MEDICAL NEED, ESPECIALLY DURING THE MIDNIGHT + TWILIGHT HOURS OF EVERY NIGHT!

ON MARCH 12, 2022, @ 5:47 I EXPERIENCED EXTREME SEVERE PAIN AND I CALL FOR HELP AND MY CELLMATE SEE EX. #1 CALLED FOR ME ALSO, AND AND THE COMMON PRACTICE IS THAT THEY TELL (ME) THE INMATES THAT THEY WILL SEND MEDICAL HELP, BUT THEY EASILY GET DISTRACTED WITH ANOTHER MATTER AND NO ONE FROM MEDICAL NEVER COME UNTIL YOU DIE OR NEARLY DIE. AFTER SEVERAL CONSECUTIVE PHONE CALLS, THEY WILL FINALLY ANSWER AND (I) THE INMATE WILL REMIND THEM AND ALL THEY SAY IS: "MY BAB, I'LL CALL MEDICAL NOW FOR YOU," AND STILL NO ONE WILL EVER COME HELP. ON MARCH 31<sup>ST</sup>, 2022, AND ALSO IN FEB. + MAY 2022, I MAKE SEVERAL EMERGENCY PHONE CALLS ON THE WALL PHONE IN MY CELL #13-D-22 WITH THE EXACT SAME RESULTS AS I EXPERIENCED 03/12/2022. ALSO, ON 03/31/2022, I COMPLAINED TO THE ROVER, THE 13<sup>TH</sup> FLOOR SARGENT ABOUT MY INTENSE PAIN AND THEY JOKED ABOUT IT AND SAID THEY CAN'T HELP, PUT IN A SICK CALL. AT MED PASS THAT SAME DAY THE NURSE TOLD ME THAT SHE HAD NOTHING FOR ME, BUT I WAS AWARE THAT SHE WAS LYING. I IMMEDIATELY A PAPER FORM SICK CALL REQUEST (AS OPPOSE TO A TABLET OR KIOSK), PLUS I SUBMITTED A MEDICAL GRIEVANCE.... THESE POLICIES, THE POLICY MAKERS + THOSE RESPONSIBLE FOR ENFORCING + CARRYING OUT THESE IN ADEQUATE POLICIES ARE CONTRARY TO WHAT THE COURT ESTABLISHED IN *MONELL*, 436 U.S. 658, 98 S. CT. 2018, 56 L. Ed. 2d 611 (1978).

APRIL 1, 2022, MY PAIN WAS CRIPPLING AND I COULD NOT EVEN LIFT MYSELF OUT OF BED AND NURSE AMANDA LNU, LEFT ME IN BED, NO MEDICINE, BUT A PROMISE TO RETURN WITH THE DOCTOR, AND SHE NEVER RETURNED.... AND.... I WAS FORCED TO LAY THERE IN BED AND SHED TEARS AS I SUFFERED! AND THE OKLAHOMA COUNTY DETENTION CENTER SHOULD NOT BE ENTITLED TO AN ABSOLUTE IMMUNITY, SCHEUER V. RHODES, 416 U.S. 232, 248, 98 S.Ct. 1683, 1692, 40 L.Ed. 2d 90.

ALL THE ABOVE AND MUCH MORE IS ONLY A SURFACE VIEW OF THE TIP OF THE ICE BERG OF CONSTITUTIONAL VIOLATIONS AS A RESULT OF THE OFFICIAL POLICIES AND WIDESPREAD PRACTICES (DESCRIBED ABOVE) THAT ARE CUSTOMARY FACILITY WIDE FROM THE BOTTOM FLOOR TO THE TOP FLOOR:

- Ⓐ. THEIR EMERGENCY MEDICAL PHONE OPERATORS ARE NOT ADEQUATELY TRAINED TO RESPOND TO SERIOUS MEDICAL NEEDS;
- Ⓑ. THEIR DETENTION OFFICERS ARE NOT ADEQUATELY TRAINED TO RESPOND TO SERIOUS MEDICAL NEEDS;
- Ⓒ. THE OFFICIAL POLICIES AND CUSTOMARY PRACTICES ARE INSUFFICIENT TO SAVE HUMAN LIFE OR TO EVEN PROVIDE SIMPLE HEALTH CARE FOR SIMILARLY SITUATED PRE-TRIAL DETAINEES WHO IS FORCED TO DEAL WITH THE SAME SEVERE PAIN THAT THE PLAINTIFF IS FORCED TO DEAL + LIVE WITH DAILY SINCE FEB. 15, 2022....;



① THE UNCONSTITUTIONAL ACTIONS OF AMANDA LNU, OTHELLA LNU, DR. WINCHESTER LNU, WILLIAM MONDAY (ADMINISTRATOR), GREG WILLIAMS (ADMINISTRATOR), TURNKEY HEALTH, OKLA. CRIMINAL JUSTICE AUTHORITY/OKLA. CO. DET. CENTER ARE REPRESENTATIVE OF THE THEIR (OKLA. CO. DET. CENTER/TURKEY HEALTH) OFFICIAL POLICY THAT'S BECOME CUSTOMARY OF THE OKLA. CO. DET. CENTER AND ARE CARRIED OUT IN THIS CASE MATTER BY THE OFFICIALS WITH THE FINAL POLICY MAKING AUTHORITY. LED BETTER V. CITY OF TOPEKA, KANSAS, 318 F.3d 1183, 1189 (10<sup>TH</sup> CIR. 2003) (QUOTING CAMFIELD V. CITY OF OKLA. CITY, 248 F.3d 1214, 1229 (10<sup>TH</sup> CIR. 2001)).... THE PLAINTIFF IS ALLEGING ALL THE ABOVE AGAINST THE OKLA. CO. DET. CENTER --- TURNKEY HEALTH --- ALL THE EMPLOYEES OF THE MENTIONED EMPLOYEES OF BOTH --- AND ESPECIALLY WILLIAM MONDAY & GREG WILLIAMS, ADMINISTRATORS OF THE JAIL TRUST'S POLICIES OF INADEQUATE TRAINING AND THEIR INADEQUATE SUPERVISION; AND THEIR UNPROFESSIONAL EMPLOYEES, AS A LACK OF SUPERVISION, CONTINUE TO ADHERE TO UNCONSTITUTIONAL CUSTOMS & PRACTICES OF "NEGLIGENCE AND DELIBERATE INDIFFERENCE TO MY PRE-TRIAL DETAINED SERIOUS MEDICAL NEEDS." THEIR REFUSAL TO GIVE INMATES THEIR PAIN MEDICATION AS THEY STAND 2 STEPS AWAY WATCHING THE INMATE IN PAIN BEGGING FOR HELP, HOLDING THE MEDICATION IN THEIR HANDS.... THEN TELL THE INMATE: "GET UP & WALK OVER HERE OR YOU WILL NOT RECEIVE YOUR MEDICATION." THE PLAINTIFF (ME), I AM IN NEED OF A TOTAL HIP JOINT REPLACEMENT AND ON A GOOD DAY I USE A CAIN TO WALK, BUT ON A BAD DAY, I CAN NOT EVEN GET OUT THE BED NOR CAN I WALK. THE NURSES WILL LEAVE ME LAYING THERE AND WALK OFF (OTHELLA LNU & AMANDA LNU) WITHOUT NO MEDICATION, AIDE NOR ASSISTANCE. THE EMERGENCY MEDICAL PHONE OPERATORS IGNORE ~~THE~~ SERIOUS MEDICAL INMATE NEEDS ACCORDING TO THIS SAME CUSTOM & PRACTICE THAT'S BECOME WIDESPREAD THROUGHOUT OKLA. CO. DET. CENTER. SEE MONELL, 436 U.S. @ 694; BOARD OF COUNTY COMM'RS V. BROWN, 520 U.S. 397, 409 (1997)



DEFENDANTS MONDAY - WILLIAMS - WINCHESTER - AMANDA LUU - OTHELLA LUU EACH POSSESSED THE RESPONSIBILITY AND THEY IMPLEMENTED AND CONTINUED THE WIDE-SPREAD PRACTICES & OPERATIONS OF THE UNCONSTITUTIONAL CUSTOMS & POLICIES THAT IGNORES MY SERIOUS MEDICAL NEED, DELIBERATELY WITH OBVIOUS INTERFERENCE TO THE NORMAL TREATMENT OF OTHER PEOPLE IN NEED OF A TOTAL HIP JOINT REPLACEMENT. THEY EACH ACTED WITH THE STATE OF MIND NECESSARY TO ESTABLISH THE ALLEGED CONSTITUTIONAL DEPRIVATION.

DODDS V. RICHARDSON, 614 F. 3d 1185, 1199 (10<sup>TH</sup> CIR. 2010); LEABETTER, 318 F. 3d 1183, 1189 (10<sup>TH</sup> CIR. 2003).

(2)(G)

"DEFENDANTS MONDAY & WILLIAMS BOTH HAD FACTUAL KNOWLEDGE OF MY SERIOUS MEDICAL NEEDS AND THEY BLATANTLY.... STRATEGICALLY.... AND INTENTIONALLY IGNORED THE EXCRUCIATING PAIN I SUFFER DAILY!" ALL IN VIOLATION OF MY 14<sup>TH</sup> AMENDMENT GUARANTEED RIGHT TO BE FREE THEIR DEPRIVATION OF MEDICAL CARE AND INHUMANE CONDITIONS OF CONFINEMENT.



(3) List the supporting facts:

IN 02/2022, I WAS TREATED BY DR. WINCHESTER OF OKIA. CO. DET.  
CENTER, HE DETERMINED THAT I NEED A TOTAL HIP JOINT REPLACEMENT  
AND PRESCRIBED A CANE TO HELP ME WALK, BUT NO PAIN MANAGEMENT,  
AND HE MADE <sup>NO</sup> ATTEMPTS TO GET OR AIDE ME IN GETTING THE SURGERY OR → SEE  
P. 16

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

PLEASE HELP ME TODAY, I NEED RELIEF FROM THIS EXCRUCIATING PAIN  
I'M EXPERIENCING DAILY; IMMEDIATE SURGERY; ESTABLISH TURN-  
-KEY POLICIES THAT WILL ASSURE MORE COMPETENT MEDICAL PERSONNEL;  
AND ESTABLISH MORE CIVILIZED POLICIES TO PREVENT THE LNU'S FROM → SEE  
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2. Claim II:

(1) List the right that you believe was violated:

8<sup>TH</sup> + 14<sup>TH</sup> AMENDMENTS OF THE UNITED STATE CONSTITUTION, EXCESSIVE  
BED BUGS.... BED BUG BITES.... BED BUG EGGS INSIDE MY ARM (RIGHT) CRAWLING.

(2) List the defendant(s) to this claim: (If you have sued more than one defendant, specify each person or entity that is a defendant for this particular claim.)

William Monday, GREG Williams, TURNKEY HEALTH, OKIA. CO. DET.  
CENTER.

(3) LIST SUPPORTING FACTS CONTINUED:

PAIN MEDS MORE STRONGER THAN A COMMON ASPIRIN. ON THE FOLLOWING DATES:

02/27/2022, I WAS DENIED THE PRESCRIBED PAIN MEDICATION BY THE MED PASS NURSE

03/11/2022, I WROTE THE OKLA. CO. CT. ADMINISTRATOR ABOUT MY PAIN AND  
MY NEED FOR SURGERY

MAR. 11, 2022, PUBLIC DEFENDER [STATE PD] CAME TO ME & REQUESTED THAT I SIGN A MEDICAL RECORD RELEASE FORM;

MAR. 12, 2022, AT 5:47 A.M. I EXPERIENCED EXTREMELY SEVERE PAIN & I CALLED FOR HELP ON THE JAIL PHONE IN MY CELL 13-D-22 AND THEY SAID THEY WOULD SEND MEDICAL, BUT THEY NEVER CAME;

MAR. 16, 2022, I FILED A "MOTION FOR MEDICAL RELEASE TO UNDERGO HIP JOINT REPLACEMENT SURGERY" IN THE OKLA. CO. DISTRICT COURT [CF-21-4401; CF-22-910];

MAR. 21, 2022, I SUBMITTED A SICK CALL SLIP TO MEDICAL ASKING FOR HELP/RELIEF FROM MY PAIN;

MAR. 21, 2022, I WROTE TO THE OKLA. CO. DIST. CT. ADMINIS-TRATOR AGAIN;

MAR. 24, 2022, I SUBMITTED MEDICAL REQUEST #170389952;

MAR. 24, 2022, I SUBMITTED A SICK CALL SLIP;

MAR. 25, 2022, I WAS TAKEN FROM 13-D-22 TO THE 8<sup>TH</sup> FLOOR OF THIS FACILITY FOR AN EKG, BLOOD WORK, AND U.A.;

MAR. 26, 2022, I SUBMITTED A SICK CALL SLIP;

MAR. 30, 2022, I FILED MEDICAL GRIEVANCE #171244422;

MAR. 30, 2022, I SENT A MEDICAL REQUEST TO ADMINISTRATOR #171244502;

MAR. 31, 2022, I FILED A MEDICAL PAIN GR. #171430742, THIS GRIEVANCE WAS CLOSED APRIL 1, 2022;

MAR. 31, 2022, I MADE TWO MEDICAL EMERGENCY CALL ON THE WALL PHONE IN MY CELL;

MAR. 31, 2022, I COMPLAINED TO THE 13<sup>TH</sup> FLOOR A.M. SHIFT

③ LIST SUPPORTING FACTS CONTINUED:

HIP JOINT SURGERY THAT SHE EXPERIENCED AND WHAT I SHOULD EXPECT TO EXPERIENCE BEFORE & AFTER SURGERY. SHE THEN GAVE ME PAIN MEDICATION AND ADVISED ME TO SUBMIT A SICK CALL SLIP TO SEE THE DOCTOR.

I OBEYED HER AND WAS SEEN BY DR. WINCHESTER NOT TOO LONG AFTERWARDS, AND HE TOLD ME THAT I NEEDED A TOTAL REPLACEMENT OF MY LEFT HIP JOINT. HE STATED THAT THE PAIN MANAGEMENT MEDICATION NECESSARY FOR MY LEVEL OF PAIN WAS NOT AUTHORIZED IN THIS INSTITUTION. HE SAID HE WOULD PRESCRIBE SOMETHING FOR MY PAIN, NOT MUCH MORE POTENT THAN ASPIRIN, BUT THAT WAS THE BEST HE COULD DO.

I AM STILL EXPERIENCING TERRIBLE PAIN WHILE OKLA. CO. CRIMINAL JUSTICE AUTHORITY CONTINUE TO PROLONG MY SUFFERING BY PLAYING A GAME WITH MY GRIEVANCE APPEAL TO THE ADMINISTRATIVE REVIEW AUTHORITY [WILLIAM MONDAY & GREG WILLIAMS], AS THEY STRATEGICALLY IGNORE THE EXCRUCIATING PAIN THAT I SUFFER DAILY WHEN I TAKE EACH STEP AS I WALK; AS I STAND TOO LONG; AS I SIT IN THE SAME POSITION TOO LONG; AS I LAY IN THE SAME POSITION TOO LONG... I SUFFER WITHOUT CEASING, THIS EXCRUCIATING PAIN DAILY....

THEREFORE, ON THE FOLLOWING DATES:

FEB. 27, 2022, I WAS DENIED THE PRESCRIBED PAIN MEDS;

MAR. 11, 2022, I WROTE THE OKLA. CO. CT ADMINISTRATOR ABOUT MY PAIN AND MY NEED FOR SURGERY;



MAR. 31, 2022, CONTINUED: SARGENT AND THE OLDER D.O. THAT WORKED THAT DAY [NAME UNKNOWN] AND I ALSO SPOKE TO THE NURSE THAT PASTED OUT MEDICATION THAT DAY AND SHE SAID THAT SHE DON'T HAVE PAIN MEDS FOR ME THAT DAY, SO I SUBMITTED A PAPER SICK CALL SLIP AND A MEDICAL GRIEVANCE

APRIL 1, 2022, I WAS BED RIDDEN WITH PAIN AND THE A.M. NURSE WHO PASTED OUT MEDS AT PILL CALL REQUESTED LPN AMANDA TO COME HELP ME. LPN AMANDA CAME TO MY CELL AND TOOK MY BLOOD PRESSURE & VITALS, SHE THEN RAN A PEN DOWN MY LEG BEFORE SHE BEGIN STICKING ME ON THE BOTTOM OF MY FOOT AND ASKED IF I FELT IT? I TOLD HER THE ONLY THING I FEEL IS THE PAIN IN MY HIP JOINT. SHE THEN SAID: "I WILL BE <sup>BACK</sup> WITH A DOCTOR AND SHE JUST LEFT ME LAYING THERE AND NEITHER HER NOR A DOCTOR EVER RETURN... NEVER!;

APRIL 6, 2022, FILED MEDICAL GRIEVANCE #172379922, IT WAS CLOSED ON MAY 02, 2022;

APRIL 7, 2022, FILED MEDICAL GRIEVANCE #172707022;

APRIL 10, 2022, FILED MED. GR. #172996032 [SURGERY];

APRIL 13, 2022, FILED GR. #171244422;

APRIL 14, 2022, PAIN WAS SO INTENSE I COULD NOT MOVE AND THE A.M. NURSE GAVE MY MEDS TO A D.O. TO BRING TO ME IN BED;



APRIL 15, 2022, ARA REQUEST TO STAFF #173868662;

APRIL 18, 2022, MEDICAL BOND #174252232;

APRIL 20, 2022, SUBMITTED PAPER SICK CALL SLIP [PAIN]

APRIL 26, 2022, EMERGENCY MEDICAL GR. #175683172,

LPN OTHELIA STOOD IN MY DOORWAY WITH MY PAIN MED IN HIS HAND, WHILE I LAY IN BED IN PAIN, AND HE MADE A JOKE ABOUT IT, BEING 7 HRS. LATE WITH MY EVENING MEDS... WHILE I LAY IN PAIN, HE WALKED OFF AND REFUSED TO GIVE ME MY PAIN MEDS

MAY 2, 2022, ARA GR. #172996032 [NEED SURGERY]

MAY 2, 2022, GR. #172379922; MAY 3, RTS #176626292;

MAY 6, 2022, ARA GR. #176637322 [SURGERY] <sup>CLOSED</sup> MAY 9, 2022;

MAY 6, 2022, ARA GR. #177276642 [SURGERY]

MAY 9, 2022, ARA GR. #177276642

MAY 9, ARA GR. #177276642, REQUESTED 2 HARD COPIES

MAY 16, REQUESTED 2 HARD COPIES OF GR. #177276642

AND THE RESPONSE WAS, THEY WILL BE DELIVERED TO MY UNIT MANAGER, BUT THEY NEVER WERE.

MAY 20, SEEN BY <sup>NURSE</sup> NURSE KYLE (BEDBUG) <sup>NEED</sup> REINSTATE ORDER

MAY 13, GR. #177267072 (BEDBUG) <sup>NEED</sup> ORDERED

MAY 6, GR. #177267072 (BEDBUG) (PRESCRIBED MEDS)

MAY 10, GR. #177971902 (BEDBUG, ARA GR APPEAL)

MAY 9, ARA GR. #176637322 (CLOSED BY GARVIN HOLLOWAY)

MAY 3, RTS. (SURGERY) MAY 17-20, NO PAIN MEDS AT ALL.

MAY 6, SUBMITTED MENTAL HEALTH SICK CALL, COULD NOT SLEEP BECAUSE OF BEDBUG BITES + EGGS IN MY ARM + NIGHTMARES OF BEDBUGS

MAY 20, NURSE KYLE SAID HE WOULD FIND OUT WHAT'S THE PROBLEM W/MY MEDS AND THEY WAS REINSTATED 5-21-2022

6-10-22 MENTAL HEALTH - NIGHTMARES BEDBUGS - SEVERE ITCHING + ULCERS  
6-11-22 SAID I'LL BE SEEN



04-15-2022, ARA REQUEST TO STAFF #173868662;

04-18-2022, MEDICAL BOND REQUEST #174252232, TO STAFF;

04-20-2022, SUBMITTED PAPER SICK CALL SLIP FOR MY EXCRUCIATING PAIN;

04-26-2022, EMERGENCY MEDICAL GRIEVANCE #175683192, OTHELLA LNU STOOD

IN DOORWAY OF MY CELL #13-A-22 WITH MY PAIN MEDS IN HIS HAND, 7 HRS LATER

THAN THE PRESCRIBED TIME/SCHEDULED TIME NORMALLY PASSED OUT (5:00pm)

WHILE I LAID IN PAIN, HE JOKED ABOUT IT AND WALKED OFF WITH MY

MEICATION + LEFT ME LAYING IN PAIN;

05-02-2022, ARA GRIEVANCE #172996032 [my NEED FOR SURGERY];

05-02-2022, GRIEVANCE #172379922;

05-03-2022, REQUEST TO STAFF #176626292;

05-06-2022, ARA GRIEVANCE #176637322 [my NEED FOR SURGERY];

05-06-2022, ARA GRIEVANCE #177276642 [SURGERY];

05-09-2022, CLOSED OUT ARA GRIEVANCE #176637322, BY GARVIN HOLLOWAY;

05-09-2022, ARA GR. #177276642, REQUEST FOR TWO HARD/PAPER COPIES;

05-16-2022, REQUESTED 2 HARD COPIES OF ARA GR. #177276642 AGAIN, BUT NEVER

WAS IT PROVIDED TO ME;

07-20-2022, PAIN <sup>SEVERE</sup> [REDACTED] COMPLAINT IGNORED TK- <sup>#</sup> 1x42y0Y5P89V PAIN EXTENDING TO SPINE + GROIN AREA;

07-31-2022, PAIN + NUMBNESS COMPLAINT IGNORED, #TK-McQMcENMFOISW;

08-22-2022, PAIN - PRE-OPT REQUEST #TK-ZG3BFJiz2dvJ, TURNKEY <sup>HEALTHY</sup> DECIDED NOT TO PAY

FOR NECESSARY SURGERY [DR. BECKY PATA] BECAUSE WHILE <sup>AT</sup> LIBERTY, WHEN I

WAS A FREE MAN, I WALKED OUT OF MY FINAL DOCTOR'S APPT. @ VA HOSPITAL

WITH DR. ALI, TO HIRE DIFFERENT PRIMARY CARE DOCTOR, FOR SECOND OPINION;

08-26-2022, PRE-OPT REQUEST, EXTREME PAIN --- #TK-M84KJ9OWOBI

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(4) RELIEF REQUESTED CONTINUED:

HAVING TO STAND IN THE <sup>WAY</sup> DOOR WITH PAIN MEDICATION IN HAND, BUT CAN NOT STEP 2 FT. INSIDE OF THE CELL OF A BEARDED INMATE SUFFERING IN PAIN ~~TO~~ GIVE HIM OR HER THEIR; PROVIDE A MORE CLEAN, SANITIZED, MODERN DAY MEDICAL UNIT FREE OF BEDBUGS AND FILTH, PLEASE; CHANGE THE POLICIES TO ALLOW MORE THAN ONE (ON SITE) DOCTOR 24 HRS./A DAY, WHICH WOULD REDUCE THE NUMBER OF DEATHS, BECAUSE IT IS IMPOSSIBLE FOR DR. WINCHESTER TO PROVIDE HIS SERVICE TO 1500 INMATES BY HIMSELF; FOR MY EXCRUCIATING PAIN I CONTINUE TO ENDURE DAILY SINCE 02-15-2022, FIVE MILLION DOLLARS AWARDED TO ME FOR THE DEBILIATING EFFECT PROLONGING SURGERY HAS HAD ON THE ~~DECREASE~~ING OF MY MOBILITY AND REDUCTION OF MY RANGE OF MOTION, LIMITING MY ABILITY TO SIT, STAND, BEND OVER, SQUAT, AND EVEN MY ABILITY TO LAY DOWN AND RELAX. ALSO, IN ORDER TO DETER THIS TYPE OF DELIBERATE INDIFFERENCE TO THE SERIOUS MEDICAL NEEDS OF OTHER INMATES & PRE-TRIAL DETAINEES IN THE FUTURE.



## 2. CLAIM II, ③ LIST THE SUPPORTING FACTS CONTINUED:

OR SQUEEZED AND POP THEM, GREEN & YELLOW SLIME WOULD GUSH OUT OF MY ARM AND SOME TIME WHEN I POPPED ONE OUT, YOU COULD SEE IT MOVE ON ITS OWN ACCORD. I WOULD SHOW THE LNU'S AND THEY WOULD GIVE ME CREAM, BUT THE CREAM DID NOT KILL THEM, IT ONLY REDUCED THE ITCHING SLIGHTLY. AFTER SOME TIME, THE LNU'S REFUSED TO GIVE ME THE CREAM BECAUSE THEY SAID THAT I NEEDED TO SEE A DOCTOR. AFTER SUBMITTING SEVERAL REQUEST TO STAFFS FOR A DOCTOR'S APPOINTMENT, I FILED:

05-06-2022, MEDICAL GRIEVANCE FOR BEDBUG BITES, GR.#177267072;

05-06+13-2022, NURSE KYLE CAME TO MY CELL #13-D-22 AND VIEWED THE SORES AND BUMPS ON MY ARMS & BODY & THE BACK OF MY HEAD, BUT HE WAS MOST CONCERNED ABOUT THE DAMAGE ON MY RIGHT ARM, AND HE ORDER MEDICATION FOR ME;

05-06-2022, I SUBMITTED MENTAL HEALTH SICK CALL, POSSIBLE BEDBUGS HATCHING INSIDE MY ARM WAS DRIVING ME CRAZY, I COULD NOT SLEEP, THINK OR NOTHING;

05-20-2022, I WAS SEEN BY NURSE KYLE BECAUSE I WAS SO PERSISTENT ABOUT GETTING HELP FOR MY RIGHT ARM AND I STILL HAD NOT RECEIVED THE MEDICATION THAT HE ORDERED FOR ME. HE APPEARED TO BE DISAPPOINTED WHEN HE SAW THE CONDITION OF MY ARM AND SAID HE WOULD "REINSTATE THE MEDICATION ORDER HE ORDERED ON MAY 6, 2022. ON THE 16<sup>TH</sup>, 17<sup>TH</sup>, + 18<sup>TH</sup> OF MAY 2022, MY ARM WAS FULL OF WHAT LOOKED LIKE PIMPLES THAT I WOULD SQUEEZE AND POP... AND NASTY LOOKING STUFF WOULD SQUEEZE OUT AND SOME OF IT WOULD MOVE ON ITS OWN ACCORD;

06-10, 2022, @ C.C.D.C. IN NORMAN OKLA., I SUBMITTED MENTAL HEALTH SICK CALL REQUEST FOR HELP WITH MY BEDBUG NIGHTMARES THAT WAS CAUSING ME MENTAL ANGUISH, LACK OF SLEEP, ITCHING & VISIONS OF ME POPPING THOSE BUMPS THAT WERE ON MY ARMS;

06-11-2022, MENTAL HEALTH SAID I WOULD BE SEEN, REQUEST #TR-FK2Y5 CHEJTV, BUT I WAS NEVER SEEN. (SEE BOTTOM OF P.#19; 07-20-2022 TO 08-26-2022)



CONTINUED FROM PAGE 24

## 3. CLAIM III: ① GROSS &amp; CULPABLE NEGLIGENCE

ALL OF THE DEFENDANTS LISTED IN THIS CIVIL ACTION PRACTICED AND CONTINUE AGGRAVATED AND CRIMINAL ACTS <sup>OF</sup> RECKLESS AND UNUSUAL DISREGARD OF DUTY, AND DELIBERATE INDIFFERENT TO MY SERIOUS [AND OTHERS] MEDICAL NEED. TURNKEY HEALTH'S DELIBERATE AND UNUSUAL DISREGARD [OF DUTY] OF SEVERE PAIN I AM STILL SUFFERING SINCE 02-15-2022, AND THE RISK OF ME BEING PERMANENT DISABILITY IN PLAINTIFF'S LEFT HIP JOINT & LEFT LEG, AND LOWER LEFT BACK AND MY GROIN AREA. SEE LAWSON V. COM. 547 S.E. 2d 513, 516-517 (Va. App. 2001).

## 3. ②: LIST THE DEFENDANTS TO THIS CLAIM:

William Monday, et al., EVERY DEFENDANT CITED IN THE ABOVE CITED CASE MATTER.

## 3. ③: SUPPORTING FACTS:

EACH DEFENDANT HAD KNOWLEDGE OF MY EXCRUCIATING DAILY PAIN AND THE EXCESSIVE RISK OF ME SUFFERING A PERMANENT DISABILITY, AS A RESULT OF THE UNUSUAL DISREGARD OF MY DAILY PAIN. AMANDA LNU, OTHEILA LNU, THE IN CELL PHONE OPERATOR'S INSUFFICIENT TRAINING ON HOW TO RESPOND TO SERIOUS MEDICAL NEEDS; DR. WINCHESTER'S LYING ABOUT HE COULD NOT GIVE ME NOTHING EXCEPT COMMON ASPIRINS, BUT DR. BECKY PATA GAVE ME COBINE & TYLENOL #4 WHEN I WAS TRANSFERRED TO C.C.D.C., AND THEY BOTH WORK FOR TURNKEY HEALTH. THE POLICIES THAT ALLOW AMANDA LNU & OTHEILA LNU TO WALK OFF FROM A PATIENT SUFFERING IN PAIN, WHILE THEY STAND 2<sup>FT</sup> AWAY WITH THE PATIENT'S MEDICATION IN HIS HAND IS INHUMANE, UNCONSTITUTIONAL AND GOES AGAINST THE HIPPOCRATIC OATH THAT TURNKEY HEALTH SO PROUDLY PROCLAIM THEY ARE SWORN UNTO.

DR. WINCHESTER WAS AUTHORIZED TO TREAT MY LEVEL OF PAIN WITH AT LEAST THE SAME THING DR. PATA DID TEMPORARILY. I WITNESSED OTHER PATIENTS ON THE SAME MEDICAL UNIT I WAS ON RECEIVE NARCOTICS DAILY, AND NO MATTER IF IT CONSTITUTED GROSS NEGLIGENCE, DELIBERATE INDIFFERENCE, INADEQUATE POLICIES OR THE CUSTOMARY PRACTICE THAT'S THE NORM IN THE OKLA. CO. DET. CENTER.... IT WAS WRONG OF HIM



BECAUSE I SUFFERED SEVERE PAIN DAILY UNDER THE CARE OF TURNKEY HEALTH AND I NEED DR. WINCHESTER, GREG WILLIAMS, WILLIAM MONDAY... IN A DESPERATE WAY... SEE ROBBIN V. OKLA, 519 F. 3d @ 1250.... THEY ALL INTENTIONALLY ALLOWED ME TO SUFFER EVEN NOW, AND ITS OBVIOUS THAT A SEVERE FRACTURE HAS OCCURRED AND THEY ALL KNOW THAT A BREAK IN MY HIP JOINT IS ONLY A MATTER OF TIME. THIS SITUATION IS A CLEAR CASE OF CRIMINAL NEGLIGENCE, BECAUSE THEY KNOW I AM STILL SUFFERING EXCRUCIATING PAIN TODAY + TURNKEY HEALTH IGNORES THIS FACT. DOBBS V. RICHARDSON, 614 F.3d 1185, 1199 (10<sup>TH</sup> CIR. 2010); MONELL, 436 U.S. 658, 691 (1978); LEDBETTER V. CITY OF TOPEKA, KS., 318 F. 3d 1183, 1189 (10<sup>TH</sup> CIR. 2003) (QUOTING CAMFIELD V. CITY OF OKLA. CITY, 248 F. 3d 1214, 1229 (10<sup>TH</sup> CIR. 2001)).

THE CONTINUED DELIBERATE "NEGLECT", PROMULGATION, CREATION, AND IM-  
-PLEMENTATION FOR THE CONTINUED OPERATION OF THESE UNCONSTITUTIONAL POLICIES, PER-  
-PETRATED WITH THE CULPABLE STATE OF MIND NECESSARY TO IMPOSE LIABILITY. SEE SELF  
V. CRUM, 439 F. 3d 1227, 1230 (10<sup>TH</sup> CIR. 2006); CLARK, 895 F. 3d @ 1267 (10<sup>TH</sup>  
CIR. 2018).

I, THE PLAINTIFF IS REQUEST THE COURT TO IMPOSE LIABILITY ON ALL THE DEFENDANTS IN BOTH, THEIR PERSONAL + OFFICIAL CAPACITIES. THEY ALL ARE GUILTY OF RECKLESS DISREGARD OF PROBABLE CONSEQUENCES OF THEIR WILFUL AND INTENTIONAL WRONGDOINGS. SEE DART V. BROWNING-FERRIS INDUS., INC., 427 MASS. @ 17, 691 N.E. 2d 526, QUOTING FROM BAIN V. SPRINGFIELD, 424 MASS. 758, 767, 678 N.E. 2d 155 (1997) (PUNITIVE DAMAGES APPROPRIATE "WHERE A DEFENDANT'S CONDUCT WARRANTS CONDEMNATION AND DETERRANCE").

### 3.④: RELIEF REQUESTED:

PUNITIVE DAMAGES OF \$1.00 PER EVERY MINUTE I SUFFERED DAILY EXCRUCIATING PAIN;  
CORRECT THE POLICIES AND POLICY ENFORCERS' IMPLEMENTATION OF THE UNCONSTITUTIONAL  
POLICIES AND THE WIDESPREAD ILLEGAL CUSTOMS.

(3) List the supporting facts:

BETWEEN 02-15-2022, (I WAS BITEN DAILY) AND 05-27-2022, ALL OVER MY BODY BY BEDBUGS AND THE MOST HORRIBLE SORES THAT DEVELOPED ON MY BODY WAS THE ONES ON MY RIGHT ARM, THAT BECAME A HOST WHERE EGGS WERE LAID INSIDE MY ARM. IT WAS TERRIBLE, WHEN I SCRATCHED THEM OR

SEE P. 21

(4) Relief requested: (State briefly exactly what you want the court to do for you.)

CONDEMN THE OKLA. DET. CENTER ENTIRE BUILDING; CHANGE THE POLICIES THAT ALLOW MENTAL HEALTH, LNU'S FROM PROVIDING PROFESSIONAL CARE, e.g., THE MENTAL HEALTH ~~WOMAN~~ AT C.C.D.C. SAID SHE HAD TOO MANY OTHER PEOPLE TO SEE BESIDES ME, SO I WAS NEVER SEEN; FIVE MILLION DOLLARS TO DETER THIS WIDESPREAD NEGLIGENCE IN THE FUTURE.

If there are more than two claims that you wish to assert, describe the additional claims using this same format on a separate sheet(s). (CLAIM III: GROSS + CULPABLE NEGLIGENCE (SEE P. 22))

## VI. Declarations

I declare under penalty of perjury that the foregoing is true and correct.  
I SWEAR THAT I'VE SERVED DEFENDANTS SIMULTANEOUSLY, 28 U.S.C. § 1746.

Michael A. Campbell  
Plaintiff's signature

09-11-2022  
Date

I further declare under penalty of perjury that I placed this complaint in the prison's legal mail system, with the correct postage attached, on the 11<sup>TH</sup> day of SEPTEMBER, 2022.

Michael A. Campbell  
Plaintiff's signature

09-11-2022  
Date